



DEPARTMENT OF THE NAVY  
SOUTHWEST DIVISION  
NAVAL FACILITIES ENGINEERING COMMAND  
1220 PACIFIC HIGHWAY  
SAN DIEGO, CA 92132-5190

N00236.000052  
ALAMEDA POINT  
SSIC NO. 5090.3

5090  
Ser 06CA.RW/1042  
December 20, 2000

Mr. Phillip Ramsey  
USEPA, Region IX.  
75 Hawthorne Street  
San Francisco, California 94105-3901

Subj: ACTION MEMORANDUM FOR TIME CRITICAL REMOVAL ACTION AT  
CLOWN PARK PLAY AREA (OU-5), NAVAL AIR STATION ALAMEDA,  
ALAMEDA, CALIFORNIA

Dear Mr. Ramsey:

This letter presents U. S. Navy (Navy) responses to comments from the U. S. Environmental Protection Agency (U.S. EPA) on the *Action Memorandum for Time-Critical Removal Action of PAH-Contaminated Soil at the Clown Park Play Area, Alameda Point, Alameda, California*. The U. S. EPA comments were presented in correspondence dated November 1, 2000.

Navy has made completion of the characterization and remediation of environmental contaminants at OU-5 the highest priority at Alameda Point (formerly Naval Air Station, Alameda). During the November 7 and 8, 2000, site visit and strategy/schedule meetings, Navy, U.S. EPA, and California EPA, Department of Toxic Substances Control developed a schedule, which will become legally binding, for the completion of CERCLA activities at OU-5. All parties also developed and agreed to an expedited, nonenforcable schedule for completion of all activities. The Draft OU-5 Remedial Investigation Work Plan will be submitted on January 19, 2001, for review and comment.

Navy has prepared the responses, presented below, to U.S. EPA comments. The Action Memorandum will not be modified. All comments and responses will be in the Administrative Record and Information Repository, providing a complete record of the removal action documentation.

General Comment:

1. All polynuclear aromatic hydrocarbon (PAH) concentrations presented within the Action Memorandum are expressed as benzo [a] pyrene (BaP) equivalents. Laboratory PAH analyses typically 16 PAH compounds. Seven of the PAHs are carcinogenic. For risk assessment purposes, the concentrations of six of the seven carcinogenic PAHs are converted to BaP equivalents by multiplying the laboratory-reported concentrations by PAH-specific toxicity equivalency factors

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(TEFs). The TEFs used to calculate the BaP equivalent concentrations included in the Action Memorandum were those accepted by U.S. EPA, and range from 0.001 to 1.

Specific Comments:

1. The response to General Comment 1, above, has presented the requested spelling and explained why BaP equivalents were used for the concentrations presented in the Action Memorandum.
2. The second paragraph of Section 1.0 identifies major milestones in the CERCLA process. The preparation of the RI Work Plan is included as one of the steps in preparation of the RI Report.
3. The word "fill" should be in the fourth sentence of the first paragraph of section 2.3, Release or Threatened Release of a Hazardous Substance or Contaminant, instead of the word "ill".
4. The correct date for the addition of Naval Air Station, Alameda to the National Priorities List is July 1999.
5. As noted in the response to General Comment 1, above, all concentrations reported in the Action Memorandum were in BaP equivalents.
6. As noted in the response to General Comment 1, above, all concentrations reported in the Action Memorandum were in BaP equivalents.
7. The requested change is noted.
8. The date for completion in Section 5.4, Project Schedule, November 10, 2000, is the correct completion date.
9. After discussion with U.S. Coast Guard representatives, Navy believed that the new play structure was to be scheduled as soon as the Coast Guard contractor was available to perform the work.

Please feel free to contact me at (619) 532-0965 if you have any questions.

Sincerely,



MICHAEL E. McCLELLAND, P.E.  
Base Realignment and Closure  
Environmental Coordinator

5090  
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Copy to:  
Ms. Anna-Marie Cook  
USEPA, Region IX  
75 Hawthorne Street  
San Francisco, California 94105-3901

Ms. Mary Rose Cassa  
Department of Toxic Substances Control  
700 Heinz Avenue, Suite 200  
Berkeley, California 94710-2721

Mr. Brad Job  
San Francisco Bay Regional Water Quality Control Board  
1515 Clay Street, Suite 1400  
Oakland, California 94612

Ms. Dina Tasini  
City of Alameda, Community Development Department  
950 West Mall Square  
Alameda, California 94501

Ms. Elizabeth Johnson  
City of Alameda, Community Development Department  
950 West Mall Square  
Alameda, California 94501

Mr. Michael Torrey  
174 Maple Way  
Alameda, California 94501-1847